REMARKS

Applicants respectfully request reconsideration in light of applicants' view that Tsushima completely fails to disclose a wavelength stacker. At no point in Tsushima's patent is there any hint of converting serial data to parallel data, either electronically or optically. Even in lines 38-43 of column 13, where Fig. 8 is discussed, Tsushima says:

> Likewise, four separate driver circuits (24) and packet transmission memories (23) could be provided in the respective input paths to the four modulators (25a-25d).

Thus, Tsushima appears to have specifically disclaimed serial-to-parallel conversion.

The apparent similarity between Tsushima's Fig. 2b, Fig. 7, or Fig.8 and Fig. 11 of the subject application is misleading: the optical delay elements in Tsushima are there only to correct chromatic dispersion, to realign parallel packets into their respective time slots. They are never used to assemble serial packets or to shift a packet from the timeslot in which it was generated. Optical delays for dispersion correction are sized according to the amount of dispersion, with no reference to the packet or slot time. On the other hand, optical delays for a packet stacker must be sized according to the packet time, which may be orders of magnitude different than the dispersion time.

Applicants believe that Tsushima's discussion of delay times (Tsushima col. 5, lines. 55-59) teaches away from the needs of a packet stacker and, therefore, believe that claim 1 is not obvious in view of the cited references. Reconsideration is respectfully solicited.

Respectfully,
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